



December 11, 2013

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
WC Docket No. 12-375

Re: Federal Communications Commission 47 CFR Part 64 [WC Docket No. 12-375; FCC 12-167] Rates for Interstate Inmate Calling Services

Dear Federal Communications Commission:

On behalf of the Arizona Detention Association, I write to express our opposition and concerns regarding the **WC Docket No. 12-375 Notice of Proposed Rulemaking regarding rates for inmate calling services**. Regulation of inmate telephone service systems by the Federal Communications Commission (FCC) would seriously hamper the ability of Arizona Jail Commanders to effectively secure and manage their jails.

In Arizona, the law requires any revenue received from inmate telephone contracts to be deposited in an Inmate Welfare Fund, which in turn, funds programs and services that directly benefit the inmates. Inmate Welfare Funds pay for educational and vocational programs, law libraries, recreation supplies, and other services that benefit inmates. What we do with the inmate welfare funds provides necessary programs that help prepare a person to return to society to be a productive citizen. Additionally, if these funds diminish, the burden to provide the same level of program services would be placed on the back of the tax payers and general fund. Regulation would compromise the funding for these important services.

We are neither unmindful of, nor unsympathetic to, the financial strains that Inmate Calling Services (ICS) rates can place on the families and friends of inmates. The challenge for Sheriffs is to balance these legitimate needs of inmates, their families, and friends, with the overriding need to ensure effective security within jails and public safety in the community.

There are very real costs associated with the administration of ICS systems, including: monitoring phone calls, analyzing recordings, providing escorts for phone repair technicians, answering questions about the system from inmates and their families, etc. the commissions that jails receive help to offset these costs. Accordingly, if the FCC were to impose new regulations that prohibited the payment of commissions to jails, Sheriffs would be forced to reduce costs associated with ICS in some other manner, most likely by reducing access to inmate phones. In short, we cannot afford to jeopardize facility security and public safety—and passing ICS administration costs along to taxpayers, at a time when county budgets are already strained, is unlikely. Thus, neither inmates, their families, or other members of the community would be served by such new FCC regulations.

Thank you for your attention to our concerns.

Sincerely,



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